

THE BELGRADE GROUP



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June 3, 2016

VIA ECF

The Hon. Magistrate Judge Ronald L. Ellis
Southern District of New York
Daniel Patrick Moynihan Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: *Jeanette Fernandez v. Mizu For Hair New York, LLC, d/b/a Mizu For Hair, and Mizu For Hair LLC, d/b/a Mizu For Hair*, 15 CV 00523 (RA)(RLE)

Dear Judge Ellis,

Along with my co-counsel from Jackson Lewis P.C., I represent Defendants in the above-referenced employment matter. On behalf of the Parties, and with reference to Your Honor's Order of May 23, 2016, we file this letter-motion to request an adjournment, in accordance with the timing requested below, of the deadline requiring Defendants to identify any expert witness on which they intend to rely and associated expert witness discovery deadlines.

The reasons for the Parties' request are that:

- There remains no outstanding fact discovery due either Party (with Defendants' having completed Plaintiff's deposition on June 1, 2016), and
- The Parties have agreed to enter into mediation to settle the litigation and are in the process of identifying a mutually acceptable mediator. The Parties' hope is that on or before the post-discovery court conference with Judge Abrams on June 10, 2016, they will have so identified a mediator and scheduled or tentatively scheduled a mediation date.

Accordingly, the Parties request that the date on which Defendants must identify their expert witness, if any, be adjourned from today, June 3rd, for a period of thirty (30) days following any failure of the Parties' mediation efforts to settle the litigation. The Parties further request that the remaining expert witness discovery deadlines be correspondingly adjourned.

This is the Parties' first request for an adjournment respecting expert witness discovery deadlines as set forth in the May 23rd Order.

Regards,

/s/

Susan M. Roberts
General Counsel

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